

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

JOSHUA J. BELOW, by his Guardian,
DEBRA BELOW, CHARLIE
ELIZABETH BELOW and
PATRICK JOSHUA BELOW, et al.

C.A. NO. 3:15-CV-00529

Plaintiffs,
and

DEAN HEALTH PLAN, INC.

Involuntary Plaintiff,

v.

YOKOHAMA TIRE CORPORATION, ABC
INSURANCE COMPANY, YOKOHAMA
CORPORATION OF AMERICA, DEF
INSURANCE COMPANY, YOKOHAMA
CORPORATION OF NORTH AMERICA,
GHI INSURANCE COMPANY,
YOKOHAMA TIRE MANUFACTURING
VIRGINIA, LLC, JKL INSURANCE
COMPANY, YOKOHAMA RUBBER
COMPANY, LTD AND MNO INSURANCE
COMPANY

Defendants.

**DEFENDANT YOKOHAMA TIRE CORPORATION'S
OBJECTIONS AND RESPONSE TO PLAINTIFFS'
FIRST INTERROGATORIES**

Comes now the Defendant, Yokohama Tire Corporation (hereinafter "YTC"), by and through counsel, and under Rules 26(c) and 33 of the Federal Rules of Civil Procedure, responds as follows:

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

YTC's responses are based on information presently available and are given without prejudice to its right to supplement or modify them based on the discovery of additional or

EXHIBIT A

INTERROGATORY NO. 9:

Describe how you or any other related entity track the number of alleged tread and/or tread-belt separations experienced with your steel belted radial passenger and light truck tires. This should include, but not be limited to, from what sources you receive the information, in what format is the information kept, who receives and inputs the information, to what departments is the information distributed, the retention policy relevant to this information, the identity of the entity that retains this information, and whether you compare rates between your manufacturing plants.

RESPONSE TO INTERROGATORY NO. 9:

YTC further objects to plaintiffs' discovery request to the extent it is overbroad and burdensome, and not reasonably calculated to lead to the discovery of admissible evidence because it is not limited to the 2003 - 2008 time period and to the subject tire, similar tires, or even LT-Metric tires. YTC further objects to the extent that Plaintiffs' discovery request is vague and ambiguous in the use of the terms "tread . . . separation" and "tread-belt separations," which are undefined. Subject to and without waiving the foregoing objections and the general objections asserted above, YTC refers plaintiffs to its objections and responses to Request for Production No. 68, and reserves the right to supplement subject to protective order its Answer to this Interrogatory as investigation and discovery proceed.

INTERROGATORY NO. 10:

Identify the information disseminated by you to consumers from January 1, 2000 to the present which addresses tire aging.

RESPONSE TO INTERROGATORY NO. 10:

YTC further objects to the extent that Plaintiffs' discovery request is vague and ambiguous in the use of the term "information . . . which addresses tire aging," which is

INTERROGATORY NO. 12:

Have you, or any of your affiliated and/or predecessor corporations, ever manufactured and/or sold passenger or light truck tires with nylon caps? If so, please state: the designation of each such tire, the dates and places of manufacture, the purposes or reasons for incorporating these elements into the tire, and the identity and address of the person(s) who recommended and/or authorized their use.

RESPONSE TO INTERROGATORY NO. 12:

Plaintiffs' discovery request is vague and ambiguous in the use of the terms "nylon caps" and "these elements," which are undefined and because plaintiffs use interchangeably without explanation the terms "nylon cap," "nylon cap plies," "nylon cap strip," "edge cover," "cap plies," and "nylon overlay." YTC further objects to plaintiffs' discovery request to the extent it is overbroad and burdensome, and not reasonably calculated to lead to the discovery of admissible evidence because it is not limited to the 2003 - 2008 time period and to the subject tire, similar tires, or even LT-Metric tires. Subject to and without waiving the foregoing objections and the general objections asserted above, to the extent "these elements" or "nylon caps" refer to construction that corresponds to Yokohama's belt cover, YTC states: Belt cover has many functions in high performance tires, including but not limited to improvement in steering maneuverability, improvement in ride comfort, reduction in weight of the tread belt structure, improvement in production process capability, improvement in tread wear and increased durability in high speed application.

Not all tires, of which the subject tire is an example, are designed for high speed performance application. Accordingly, the Subject Tire is a LT-Metric size tire that includes belt cover consisting of two jointless edge covers.